



R. SCOTT HEITKAMP
Chairman

TIMOTHY K. ZIMMERMAN
Chairman-Elect

PRESTON L. KENNEDY
Vice Chairman

DEREK B. WILLIAMS
Treasurer

CHRISTOPHER JORDAN
Secretary

REBECA ROMERO RAINEY
Immediate Past Chairman

CAMDEN R. FINE
President and CEO

Via ECFS

March 23, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: Wilson Electronics Petition for Rulemaking to Eliminate the
Personal Use Restriction on Wideband Consumer Signal Boosters
(*WT Docket No. 10-4*)

Dear Ms. Dortch:

The Independent Community Bankers of America¹ (ICBA) appreciates the opportunity to comment on *Wilson Electronics Petition for Rulemaking to Eliminate the Personal Use Restriction on Wideband Consumer Signal Boosters* ("Wilson"). ICBA requests the Federal Communications Commission ("Commission") to grant this petition.

In 2014, the Commission adopted rules for the use of broadband signal boosters which established a "personal-use" restriction. The rules were intended to help businesses and improve cellular coverage but the personal-use restriction has hampered those efforts. Wilson has petitioned the Commission to eliminate the personal-use restriction on broadband signal boosters.

¹ The Independent Community Bankers of America®, the nation's voice for more than 5,800 community banks of all sizes and charter types, is dedicated exclusively to representing the interests of the community banking industry and its membership through effective advocacy, best-in-class education and high-quality products and services.

With 52,000 locations, nationwide, community banks employ 760,000 Americans, hold \$4.7 trillion in assets, \$3.7 trillion in deposits, and \$3.2 trillion in loans to consumers, small businesses, and the agricultural community. For more information, visit ICBA's website at www.icba.org.

The Nation's Voice for Community Banks.®

WASHINGTON, DC ■ SAUK CENTRE, MN ■ IRVINE, CA ■ TAMPA, FL ■ MEMPHIS, TN

1615 L Street NW, Suite 900, Washington, DC 20036-5623 | 800-422-8439 | FAX: 202-659-1413 | Email: info@icba.org | Website: www.icba.org

Broadband signal boosters are devices that community banks in urban and rural parts of the country can use to improve weak cellular signals, especially in underserved and difficult to serve areas. While the rule was intended to help small businesses, such as community banks, the personal-use restriction has caused confusion with regard to the extent the devices are used within a business. Hence, the current rule could prohibit community banks from installing these devices, out of caution, and force them to settle for unreliable cellular service in their branches or expensive alternatives with burdensome registration requirements.

Community banks have a stellar reputation for knowing their customers' needs. They provide a vast menu of mobile products and services that require accessibility and adequate cellular reception. With consumers using their cell phones to view and monitor bank accounts, to chat with customer service, and to initiate transactions, removing the personal-use restriction would be beneficial for our members and their customers.

Additionally, more community bank employees use their cell phones for working remotely from home or while on business travel. Disruptions in cell service will thwart access and can have a negative impact on telephone and email communications, document uploads and downloads, and overall productivity. Strong and efficient cell coverage is crucial for business continuity.

Community bank customers and employees are among the growing numbers of those who have grown so dependent on their cell phones that many of them no longer have landlines. Cellphones are no longer just a trend, a luxury, or a convenience but has now become a necessity. As such, it is important that community banks continue adapting and have the infrastructure needed to support reliable cellular service.

ICBA appreciates the opportunity to comment on this petition. If you have any questions or would like additional information, please contact Rhonda Thomas-Whitley (Rhonda.Thomas-Whitley@icba.org) at 202-659-8111.

Sincerely,

/s/

Rhonda Thomas-Whitley
Assistant Vice President & Regulatory Counsel

The Nation's Voice for Community Banks.®

WASHINGTON, DC ■ SAUK CENTRE, MN ■ IRVINE, CA ■ TAMPA, FL ■ MEMPHIS, TN

1615 L Street NW, Suite 900, Washington, DC 20036-5623 | 800-422-8439 | FAX: 202-659-1413 | Email: info@icba.org | Website: www.icba.org

The Nation's Voice for Community Banks.®

WASHINGTON, DC ■ SAUK CENTRE, MN ■ IRVINE, CA ■ TAMPA, FL ■ MEMPHIS, TN

1615 L Street NW, Suite 900, Washington, DC 20036-5623 | 800-422-8439 | FAX: 202-659-1413 | Email: info@icba.org | Website: www.icba.org